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April 28, 2004

The Honorable Bruce Duke
Executive Director
Public Service Commission of SC
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region
InterLATA Services Pursuant to Section 271 of the Telecommunications Act of
1996
Docket No. 2001-209-C

Dear Mr. Duke:

Enclosed for filing are the original and 15 copies of BellSouth Telecommunications, Inc.'s ("BellSouth's") performance data change Notification Reports for May 2004 and preliminary June 2004. These data change Notification Reports are being provided to inform the Commission of the changes BellSouth plans to make to its Performance Measures Analysis Platform ("PMAP") with May data, and previews the changes BellSouth is considering making for June data. A Data Disclosure Report for April 2004 would be filed at this time as well, if needed; however, for April 2004 there are no additional South Carolina validated data issues to be disclosed that affect performance measurement calculations for which a fix has not yet been scheduled.

There is one additional matter that BellSouth would like to bring to the attention of the Commission and the parties. First, in its January 2004 Data Notifications filed on January 7, 2004, BellSouth provided notice to remove Special Access services that are erroneously being included in certain of the BellSouth Retail Analog data (Item No. 9). Although BellSouth expected to implement this change with January data, the change will be implemented with March 2004 data instead.

The Honorable Bruce Duke
April 28, 2004
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Sincerely,

A handwritten signature in black ink, appearing to read "Patrick W. Turner". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Patrick W. Turner

PWT/nml

Enclosure

cc: All Parties of Record
PC Docs # 535752

PROPOSED MAY 2004 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the May 2004 data month. Results for the May 2004 data month will be posted as follows:

Preliminary results June 21, 2004
Final results June 30, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement ("SQM") Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

(1) *Affected Measures:* OSS-1

Description of Change: During the conversion process of mechanizing the OSS-1 measure, BellSouth identified several issues with the reporting of OSS-1 data. BellSouth proposes the following changes to be made to correct this reporting: (i) add additional filter to more accurately identify transactions, contract events, and timestamps for queries launched through EDI, LENS, and TAG/XML; (ii) include omitted DD and DSAP contract events in transaction reporting; (iii) eliminate extraneous contract events, such as RSAG queries by DSAP; (iv) correct reporting of RSAG Transactions as DSAP transactions in North Carolina; and (v) add additional constraints to more accurately capture and report response intervals as summation of events and to properly associate transactions and events to the appropriate reporting period. This proposed change was Item (2) on the Preliminary May Data Notification filed on March 1, 2004. (RQ5053, RQ5054, RQ5055, RQ5056, and RQ5057)

Impact of Change: For January 2004, the CRIS/LENS average call per second would increase from 2.86 to 3.02 seconds, and the TAG/DSAP average call per second would decrease from 1.48 to 0.70 seconds.

Provisioning Measurements

- (2) *Affected Measures:* P-7A (Florida, North Carolina, and Tennessee)

Description of Change: Currently, for this measure, BellSouth reports both IDLC and Non-IDLC data on the same report. BellSouth also produces the same Non-IDLC data in another report. BellSouth proposes to remove the Non-IDLC data from the IDLC report, as it is duplicative. This proposed change was Item (3) on the Preliminary May Data Notification filed on March 1, 2004. (RQ4872)

Impact of Change: None

- (3) *Affected Measures:* P-12 (North Carolina)

Description of Change: Currently, LNP Percent Missed Installation Appointments data is being reported for North Carolina, even though this measure is not part of the North Carolina SQM. BellSouth proposes to remove this measure consistent with the SQM. This proposed change was Item (4) on the Preliminary May Data Notification filed on March 1, 2004. (RQ4885)

Impact of Change: None

- (4) *Affected Measures:* P-11 (Florida, Georgia, and Tennessee)

Description of Change: Currently, BellSouth classifies any LEO order as partially mechanized for this measure if it has a character string of "t-signout" in the audit log. BellSouth has determined that some orders with this code were being completed without service representative intervention. BellSouth proposes providing an additional check by looking at the SOCS history file for user ID's to verify that the order is partially mechanized. This proposed change was Item (5) on the Preliminary May Data Notification filed on March 1, 2004. (RQ4959)

Impact of Change: For January 2004, in the region, 220 fully mechanized orders in Florida, Georgia, and Tennessee were included in the partially mechanized volume of the Service Order Accuracy metric. The change to the metric is less than 0.01%.

- (5) *Affected Measures:* P-7C

Description of Change: BellSouth has discovered that it is overstating circuit counts for this measure. BellSouth proposes to change the lookup tables to accurately determine the appropriate circuit count. This proposed change was Item (6) on the Preliminary May Data Notification filed on March 1, 2004. (RQ4988)

Impact of Change: For December 2003, in Georgia, the trouble report rate would change from .57% to 1.07%. For the same period in Florida, the trouble report rate would change from .46% to .88%.

(6) *Affected Measures:* P-7A

Description of Change: Currently, BellSouth is producing summary rows on the one-month aggregate report for this measure, even though these rows contain no data and are not required by the SQM. BellSouth proposes removing these summary rows from the report. This proposed change was Item (7) on the Preliminary May Data Notification filed on March 1, 2004. (RQ5000)

Impact of Change: None

(7) *Affected Measures:* P-7 (Louisiana only)

Description of Change: Currently, for the CLEC MSA reports, some interval buckets are being duplicated. BellSouth propose to eliminate duplication of interval buckets. This proposed change was Item (8) on the Preliminary May Data Notification filed on March 1, 2004. (RQ5003)

Impact of Change: None

M&R Measurements

(8) *Affected Measures:* MR1, 2, 3, 4 & 5 (North Carolina and Tennessee)

Description of Change: Currently, BellSouth is counting troubles and line counts in both the UNE Digital Loop and UNE Other-Design disaggregations. BellSouth proposes to correct this problem by eliminating these circuits and troubles from the UNE Other-Design disaggregation. This proposed change was Item (9) on the Preliminary May Data Notification filed on March 1, 2004. (RQ4972)

Impact of Change: Numerator and denominator values for the UNE Other-Design disaggregations will be reduced for the measures impacted. Based on December 2003 data, North Carolina and Tennessee CTRR numerators will be reduced to "0" and line counts will be reduced by approximately 97%.

Billing Measurements

- (9) *Affected Measures:* B-10

Description of Change: Currently, some billing adjustments that are disputed by BellSouth are erroneously being captured in this measure. BellSouth proposes to change the code to exclude these billing disputes consistent with the SQM. This proposed change was Item (10) on the Preliminary May Data Notification filed on March 1, 2004. (RQ5015)

Impact of Change: For December 2003, 89 disputes in the region that were not due within the December reporting period should have been excluded from this metric. The results for the region would have increased from 90.71% to 92.75%.

Special Access Measurements

- (10) *Affected Measures:* SA-7 (Florida, Georgia, and Tennessee)

Description of Change: Currently, the code is not marking the records that are past due from a previous month in the current month's report. The report is displaying all circuits that are candidates for the Past Due Circuits measure from the previous month, including those circuits that are past due. BellSouth proposes to display all the circuits due in the current month, but have an original committed due date in a previous month, as the volume for this measure consistent with the SQM. Once the base is established, the report will display any circuit that was past due and canceled, as the numerator for the measure. The metric is determined by dividing the volume into the numerator, times 100. This proposed change was Item (11) on the Preliminary May Data Notification filed on March 1, 2004. (RQ4859)

Impact of Change: For November 2003, in Florida, the volume of circuits for the Percent Cancellations after FOC due date would decrease from 50 to 2.

PRELIMINARY JUNE 2004 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the June 2004 data month. Results for the June 2004 data month will be posted as follows:

Preliminary results July 21, 2004
Final results July 30, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

(1) *Affected Measures:* O-7 & O-8

Description of Change: Currently, BellSouth is calculating the Reject Interval for non-mechanized Trunk ASRs from the initial received date, without considering subsequent versions. BellSouth proposes to correctly identify and align the appropriate response timestamp with the corresponding version of the ASR. This modification will also allow for the proper reporting of these measures by assuring that the Reject occurred in the correct reporting period. (RQ4862)

Impact of Change: BellSouth continues to investigate the impact of the proposed change and will quantify this impact as soon as possible.

(2) *Affected Measures:* O-11 (Alabama, Kentucky, Mississippi, and South Carolina)

Description of Change: Currently, in the states where multiple responses under this measure are reported, Local Interconnection Trunks are not included as a product on the Aggregate and 12 month reports. Additionally, they are not included on the multiple response regional reports for this measure. BellSouth proposes to correct both these reporting problems. (RQ5123)

Impact of Change: None.

(3) *Affected Measures:* O-7

Description of Change: Currently, a CLEC can respond to a fatal reject with the same CC, PON and Version. For LSRs that have LNP requests, BellSouth is not always able to associate this LSR with the appropriate receipt time. BellSouth proposes to add an additional key to correctly identify the receipt time of this LSR. (RQ5124)

Impact of Change: For January 2004, 49 of 2451 (2%) LNP fatal reject records in the region were not counted as a result of this issue.

(4) *Affected Measures:* O-9 & O-11

Description of Change: Currently, BellSouth is not correctly associating the confirmed timestamps with ASRs submitted for Local Interconnection Trunks. BellSouth proposes to correct the code to capture responses for Local Interconnection Trunks. (RQ5134)

Impact of Change: For January 2004, the result for Local Interconnection Trunks under Measure O-11 would change from 84.78% to 100% in Tennessee.

Provisioning Measurements

(5) *Affected Measures:* P-4 (Louisiana)

Description of Change: Currently, the MSA Aggregate One Month reports for OCI display an incorrect Average Interval for both BST and CLECs. BellSouth proposes to correct the average interval to display the correct average per product. (RQ5024)

Impact of Change: For December 2003 data, the average interval for Alexandria, LA, MSA-Resale Business Non-Dispatch, the metric would change from 0.0 to 2.0 and for Retail Business, the metric would change from 0.0 to 1.73 days.

(6) *Affected Measures:* P-7C

Description of Change: Currently, BellSouth is not displaying all disaggregations on the 12-month report when there is no data to place on the historical report. BellSouth proposes to display all disaggregations on the 12-month report even when no data is present in the reporting period. (RQ5029)

Impact of Change: None.

- (7) *Affected Measures:* P-7, P-7A, P-7C & P-8

Description of Change: BellSouth proposes adding new fields to the raw data and Other Supporting Data File (CTOVR_CMPLTN_DTTM, CTOVR_KEY, SO_CMPLTN_DT). The addition of these fields will have no immediate impact on replicating the SQM reports but would be available for use with future enhancements. (RQ5044)

Impact of Change: None.

- (8) *Affected Measures:* P-2B

Description of Change: Currently, for % Orders Given Jeopardy Notice, the numerator includes orders where the committed date of facility resolution is within the reporting period. BellSouth proposes to implement coding to capture orders with a due date in the reporting period instead of the committed date of the facility resolution in the reporting period consistent with the SQM. (RQ5107)

Impact of Change: For December 2003, in Florida, for % Jeopardy – Mechanized, UNE Loop + Port Combinations, Dispatched, the numerator would change from 233 to 176. This would cause the result to change from 6.95% to 5.25%.

- (9) *Affected Measures:* P-2A (Florida and Tennessee)

Description of Change: Currently, for % Orders Given Jeopardy Notice \geq 48 Hours, BellSouth is using the committed due date of the facility resolution to determine which orders to include in the denominator of this measure. BellSouth proposes to capture orders with the committed due date in the reporting period in Florida and Tennessee for both the numerator and denominator consistent with the SQM. (RQ5107)

Impact of Change: For December 2003 in Florida, the Percent Jeopardy Notice \geq 48 Hours Mechanized, the UNE Loop + Port Combination Dispatch disaggregation, the denominator would change from 233 to 176. This would cause the result to go from 75.5% to 100%.

- (10) *Affected Measures:* P-11 (Florida, Georgia, and Tennessee)

Description of Change: BellSouth is currently including “C” orders written in response to LSRs with an ACT of ‘C’ and an LNA of ‘D’. Since these orders are disconnect orders and disconnect orders are excluded from this measure consistent with the SQM, BellSouth proposes to change the code to correct the problem. (RQ5132)

Impact of Change: For January 2004 Regional data, 34 orders would be excluded from the volume of this measure. Excluding these records would have less than a .01% effect on this measure.

Special Access Measurements

(11) *Affected Measures:* SA-7 (Tennessee)

Description of Change: Currently, the 12-Month SRS Report for Past Due Circuits, “% Cancellations After FOC Due Date” is not being produced in Tennessee. BellSouth proposes to produce this report. (RQ5120)

Impact of Change: None.

STATE OF SOUTH CAROLINA)

COUNTY OF RICHLAND)

CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Proposed May 2004 Data Notification Report and Preliminary June 2004 Data Notification Report in Docket No. 2001-209-C to be served upon the following this April 28, 2004:

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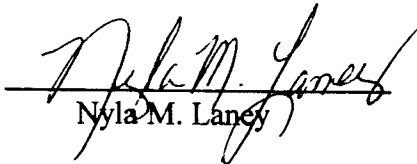
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